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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT

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SAN FRANCISCO DIVISION

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ATS AUTOMATION TOOLING
SYSTEM, INC. AND THERMAL FORM
& FUNCTION LLC,

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Plaintiffs,

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vs.

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FOXCONN ELECTRONICS, INC.,
FOXCONN TECHNOLOGY CO., LTD.,
HON HAI PRECISION INDUSTRY CO.,
LTD., and DOES 1 THROUGH 10,

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Defendants.

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CASE NO. C03-2648 PJH

**DECLARATION OF JAY C. CHIU IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

Date: March 9, 2005

Time: 9:00 a.m.

Judge: Hon. Phyllis J. Hamilton

DECLARATION OF JAY C. CHIU

I, Jay C. Chiu, declare as follows:

1. I have personal knowledge of the facts stated herein, except those stated on information and belief and, if called upon, could and would testify competently to them. I am an attorney of Alschuler Grossman Stein & Kahan, LLP (“Alschuler”), and I am counsel of record for defendants Foxconn Electronics, Inc., Foxconn Technology Co., Ltd., and Hon Hai Precision Industry Co., Ltd. (collectively, “Defendants”).

2. Based on my review of the documents that Defendants have produced to the Plaintiffs, and on information and belief, Defendants have provided to the Plaintiffs technical documents of heat sink assemblies/devices with the following model numbers: 8H180, 306EM, 410NP, 64HHP, 8C246, 9H010, 8F504, 7R769, 7P182, 5P573, 6F547, 5P573, 2E441, 9T642, 215894-001, 215895-001, 219115-001, 292325-001, and 250044-001.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 28th day of January, 2005 at Santa Monica, California.

DATED: January 28, 2005

By JAY C. CHIU